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September 12, 2022

**Via ECF**

The Honorable Esther Salas, U.S.D.J.  
United States District Judge for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: United States v. Da Ying Sze  
Case No. 2:22-cr-00141-ES**

**EXTENSION REQUEST**

Dear Judge Salas,

This office currently represents two individuals—and expects to represent additional individuals shortly—for the purpose of petitioning the Court pursuant to 21 U.S.C. § 853(n) to adjudicate ownership of funds seized in the above-referenced action. However, these clients were not referred to our office until late afternoon this past Friday and the deadline to make such petitions is tomorrow, September 13, 2022. For the reasons set forth below, we respectfully request an extension of time to file our petitions.

In short, we have been contacted by multiple groups of individuals who believe they may have an interest in the funds subject to forfeiture, and for each group it is not clear (1) which individuals should properly assert ownership of the funds in question, and (2) the extent of the funds over which they can substantiate their claims. Two individuals have already executed engagement agreements with our office and we have been in communication with multiple others who have not yet retained our firm. At this point we are still performing due diligence into which individuals should properly assert claims to which funds. It appears likely we will ultimately file petitions for at least some of the funds on behalf of someone other than, but connected to, the individuals who first contacted us. Moreover, our due diligence efforts are complicated by significant language barriers we are working through.

Based on these facts, we respectfully request an extension of two weeks to file our petitions for adjudication of ownership of funds until September 26, 2022. We have spoken to the U.S. Attorney's office who has advised us they have no objection to this request.

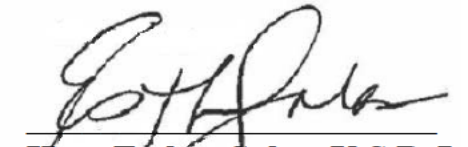
Very truly yours,

*Matthew Eyet*

Matthew T. Eyet, Esq.  
Eyet Law LLC

Cc: All parties of record via ECF

**SO ORDERED.**

  
**Hon. Esther Salas, U.S.D.J.**  
**Dated:** September 13, 2022